

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

10 CIV 1630

THE NORTH FACE APPAREL CORP., a  
Delaware Corporation; and PRL USA  
HOLDINGS, INC., a Delaware  
Corporation,

Plaintiffs

v.

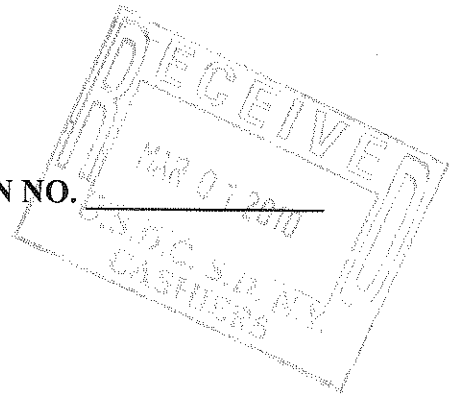
FUJIAN SHARING IMPORT & EXPORT  
LTD. CO., d/b/a B2BSHARING.COM;  
DONGPING LIU a/k/a DONG PING LIU;  
YUAN CHEN; ANDY HUANG; MIN  
CHEN; CAI XIAN SHENG; MICHAEL  
LIN; LI MING WANG; FANG CHENG;  
LIN WEIXIAN; ZHOU CHANG; LAIKE  
ALHASSAN; PP JINBO; JERRY URBEN;  
HUNAG YANXIA; WANG ZHAO HUI;  
JOHN DOES 1-100; JANE DOES 1-100;  
and XYZ COMPANIES 1-100,

Defendants.

CIVIL ACTION NO.

COMPLAINT

[FILED UNDER SEAL PURSUANT  
TO 15 U.S.C. § 1116]



Plaintiffs THE NORTH FACE APPAREL CORP. and PRL USA HOLDINGS, INC. hereby file this Complaint for *inter alia* trademark counterfeiting, cybersquatting and related claims against Defendants FUJIAN SHARING IMPORT & EXPORT LTD. CO., d/b/a B2BSHARING.COM; DONGPING LIU a/k/a DONG PING LIU; YUAN CHEN; ANDY HUANG; MIN CHEN; CAI XIAN SHENG; MICHAEL LIN; LI MING WANG; FANG CHENG; LIN WEIXIAN; ZHOU CHANG; LAIKE ALHASSAN; PP JINBO; JERRY URBEN; HUNAG YANXIA; WANG ZHAO HUI; JOHN DOES 1-100; JANE DOES 1-100; and XYZ COMPANIES 1-100, on personal knowledge as to Plaintiffs' own activities and on information and belief as to the activities of others:

**THE PARTIES**

1. Plaintiff THE NORTH FACE APPAREL CORP. (“The North Face”) is a corporation, organized and existing under the laws of Delaware, having a principal place of business at 3411 Silverside Road, Wilmington, Delaware 19810.

2. Plaintiff PRL USA HOLDINGS, INC. (“Polo Ralph Lauren”) is a corporation, organized and existing under the laws of the State of Delaware, having its principal place of business at 103 Foulk Road, Wilmington, Delaware 19803. (The North Face and Polo Ralph Lauren are collectively referred to as “Plaintiffs” and each, individually, as a “Plaintiff.”)

3. Defendant FUJIAN SHARING IMPORT & EXPORT LTD. CO., d/b/a B2BSHARING.COM is a business whose actual name is currently unconfirmed and true address currently unknown.

4. Defendant DONGPING LIU a/k/a DONG PING LIU is an individual whose actual name is unconfirmed and true address currently unknown.

5. Defendant YUAN CHEN is an individual whose actual name is unconfirmed and true address currently unknown.

6. Defendant ANDY HUANG is an individual whose actual name is unconfirmed and true address currently unknown.

7. Defendant MIN CHEN is an individual whose actual name is unconfirmed and true address currently unknown.

8. Defendant CAI XIAN SHENG is an individual whose actual name is unconfirmed and true address currently unknown.

9. Defendant MICHAEL LIN is an individual whose actual name is unconfirmed and true address currently unknown.

10. Defendant LI MING WANG is an individual whose actual name is unconfirmed and true address currently unknown.

11. Defendant FANG CHENG is an individual whose actual name is unconfirmed and true address currently unknown.

12. Defendant LIN WEIXIAN is an individual whose actual name is unconfirmed and true address currently unknown.

13. Defendant ZHOU CHANG is an individual whose actual name is unconfirmed and true address currently unknown.

14. Defendant LAIKE ALHASSAN is an individual whose actual name is unconfirmed and true address currently unknown.

15. Defendant PP JINBO is an individual whose actual name is unconfirmed and true address currently unknown.

16. Defendant JERRY URBEN is an individual whose actual name is unconfirmed and true address currently unknown.

17. Defendant HUNAG YANXIA is an individual whose actual name is unconfirmed and true address currently unknown.

18. Defendant WANG ZHAO HUI is an individual whose actual name is unconfirmed and true address currently unknown.

19. The preceding named Defendants are acting in conjunction with various Defendant John Does and Jane Does 1-100 and XYZ Companies 1-100 whose identities are not

presently known (collectively, “Defendants”). If Defendants’ identities become known, the Complaint herein will be amended to include such names of these individuals and corporations.

20. Defendants are doing business in New York and this District and are subject to the jurisdiction of this Court.

### **JURISDICTION AND VENUE**

21. This is an action for trademark counterfeiting and trademark infringement, cybersquatting and unfair competition and false designation of origin arising under the Trademark Act of 1946, 15 U.S.C. §§ 1051, *et seq.*, as amended by the Trademark Counterfeiting Act of 1984, Public Law 98-473 (October 12, 1984), the Anti-Counterfeiting Consumer Protection Act of 1996, Pub. L. 104-153 (July 2, 1996), and the Prioritizing Resources and Organization for Intellectual Property Act of 2007, H.R. 4279 (October 13, 2008) (the “Lanham Act”), and for unlawful and deceptive acts and practices under the laws of the State of New York.


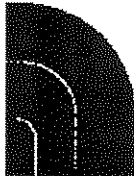
22. This Court has original jurisdiction over this action pursuant to 28 U.S.C. §§ 1331, 1332 and 1338(a) and (b); and 15 U.S.C. §§ 1116 and 1121. This Court has jurisdiction, pursuant to the principles of supplemental jurisdiction and 28 U.S.C. § 1367, over Plaintiffs’ claims for unlawful and deceptive acts and practices under the laws of the State of New York.




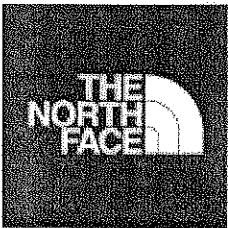
23. This Court has personal jurisdiction over Defendants in that they transact business in the State of New York and this District.

24. Venue is proper in this District pursuant to 28 U.S.C. §§ 1391 and 1400(a) in that the Defendants are entities or individuals subject to personal jurisdiction in this District.

**BACKGROUND FACTS****The North Face's Trademarks and Business**

25. The North Face is the owner of the entire right, title and interest in and to, *inter alia*, the following federally-registered trademarks and service marks:

| Registration Number | Trademark   | Goods and Services   |
|---------------------|---|--|
| 983,624             | THE NORTH FACE  | Backpacks, sleeping bags, tents, snowshoes, skis and camping clothing, namely rainwear, parkas, vests, trousers, shoes, gloves and headgear. |
| 1,030,071           |    | Backpacks, sleeping bags, tents, snowshoes, skis and camping clothing, namely rainwear, parkas, vests, trousers, shoes, gloves and headgear. |
| 1,102,407           |  | Retail store, mail order, and distributorship services in the field of camping and outdoor gear, books, food, hardware and sports equipment. |

| Registration Number | Trademark   | Goods and Services  |
|---------------------|---|---|
| 2,097,715           |    | Backpacks, sleeping bags, tents, snowshoes, skis and clothing, namely, parkas, vests, jackets, anoraks, pants, ski bibs, gloves, mittens, underwear, hats, headbands, caps, ski suits, gaiters, shorts, shirts and belts.                                   |
| 2,300,758           |    | Shoes.  |
| 2,897,197           | NEVER STOP EXPLORING  | Backpacks, luggage, duffel bags, waist packs, sleeping bags, tents, clothing, namely, t-shirts, tops, shorts, sweatshirt, sweaters, pants, jackets, vests, anoraks, ski suits, ski jackets, ski vests, rain jackets, and rain pants, footwear and headwear. |
| 3,294,604           | THE NORTH FACE  | Retail store, mail order, and distributorship services in the field of camping and outdoor gear, books, food, hardware and sports equipment.  |
| 3,294,605           |  | Retail store, mail order, and distributorship services in the field of camping and outdoor gear, books, food, hardware and sports equipment.  |
| 3,538,773           |  | Bags, umbrellas, sleeping bags, tents, tent accessories, clothing, retail services.   |
| 3,630,564           | NEVER STOP EXPLORING  | Retail store and on-line retail store services in the field of apparel, camping and outdoor gear, and outdoor sporting goods equipment.   |

26. All of the registrations listed above are valid, subsisting, unrevoked and uncanceled. Additionally, many of the registrations are also incontestable. The North Face also owns common law rights in these and other marks for use in connection with apparel and retail store services, including on-line retail store services. The North Face's registered and common law trademarks are collectively referred to as the "THE NORTH FACE Marks."

27. The North Face, its predecessors in interest, associated companies and authorized licensees have sold high quality technical and casual outdoor apparel and equipment and other products ("The North Face Products") for more than 40 years using the THE NORTH FACE Marks. Among the most well-known and popular of the North Face Products are the iconic "Denali" and "Nuptse" style jackets.

28. The THE NORTH FACE Marks have been widely promoted, both in the United States and throughout the world and are among the world's most famous and widely-recognized trademarks. Consumers, potential consumers and other members of the public and outdoor products industry not only associate The North Face Products with exceptional materials, style and workmanship, but also recognize that The North Face Products sold in the U.S. originate exclusively with The North Face.

29. The North Face maintains quality control standards for all The North Face Products. Genuine The North Face Products are distributed through a worldwide network of authorized licensees, distributors, and retailers, including The North Face retail stores and The North Face's Internet web store located at [www.thenorthface.com](http://www.thenorthface.com).

30. The THE NORTH FACE Marks are featured prominently in the advertising and promotion of The North Face Products. In 2009 alone, The North Face spent over \$15 million in advertising and promoting The North Face Products, which prominently bear the THE NORTH




FACE Marks. The THE NORTH FACE Marks are highly visible and distinctive worldwide symbols of excellence in quality and uniquely associated with The North Face.



31. As a result, THE NORTH FACE Products bearing the THE NORTH FACE Marks generated over \$600 million dollars in sales in 2009 alone.




#### **Polo Ralph Lauren's Trademarks and Business**

32. Polo Ralph Lauren is the owner of the entire right, title and interest in and to, *inter alia*, the following federally-registered trademarks and service marks:

| <b>Registration Number</b> | <b>Trademark</b>   | <b>Goods and Services</b>  |
|----------------------------|--|--|
| 1,624,989                  | RALPH LAUREN   | Clothing - namely, suits, slacks, trousers, shorts, wind resistant jackets, jackets, blazers, dress shirts, knit shirts, sweatshirts, sweaters, hats, belts, socks, blouses, skirts, coats and dresses.  |
| 984,005                    |  RALPH LAUREN | Suits, overcoats, sweaters, ties, shirts and pants.  |
| 3,521,190                  | RALPH LAUREN   | On-line retail store services featuring men's, women's and children's clothing, footwear, headgear, eyewear, handbags, backpacks, travel bags, wallets, athletic bags, jewelry, watches, sporting goods and accessories, fragrance, body lotions, home furnishing in the nature of bedsheets, duvet covers, comforters, blankets, pillows, towels, table cloths, dinnerware, picture frames. |
| 2,077,090                  | RALPH LAUREN   | Providing information in the field of fashion, lifestyle and other topics of general interest by means of a global computer network  |



|           |   |   |
|-----------|---|---|
| 1,962,237 | RALPH LAUREN  | Mail order services featuring men's, womens' or children's wearing apparel, fashion accessories, home furnishings products and personal care products.                                    |
| 3,733,341 | POLO RALPH LAUREN   | Sweaters, shirts, sweatshirts, pants, shorts, jackets, coats, vests, hats, scarves, gloves, belts, ties, underwear, socks, shoes, sneakers, boots. sleepwear, robes, men's suits.         |
| 3,306,101 | POLO  RALPH LAUREN | Clothing, namely, knit shirts, polo shirts, sweaters, shirts, t-shirts, hats, swimwear, pants, jackets, belts, ties, footwear, socks; outerwear, namely, coats, sport coats, raincoats.   |
| 1,363,459 | POLO  | Clothing-Namely, Suits, Slacks, Trousers, Shorts, Wind Resistant Jackets, Jackets, Blazers, Dress Shirts, Sweatshirts, Sweaters, Hats, Belts, Socks, Blouses, Skirts, Coats, and Dresses. |
| 2,083,276 | POLO  | Providing information in the field of fashion, fragrance, lifestyle and other topics of general interest by means of a global computer network.   |
| 3,199,839 |                  | Wearing apparel, namely, jackets, sweatshirts, sweat pants, hats, scarves, jerseys, jeans, turtlenecks and bikinis.   |
| 2,085,471 |                  | Providing information in the field of fashion, fragrance, lifestyle and other topics of general interest by means of a global computer network.   |

|           |   |  |
|-----------|---|--|
| 990,395   | POLO BY RALPH LAUREN  | Retail clothing store services.  |
| 2,643,114 | LAUREN  | Retail clothing store services.  |
| 2,312,818 | RL  | Wearing apparel, namely, jeans, jackets, woven shirts, T-shirts, knit shirts, sweatshirts, [ overalls, ] pants, sweaters, shorts, vests, [ ties, ] bathing suits, scarves, hosiery, [ bodysuits, ] belts, blouses, skirts, dresses, coats, hats and shoes. |
| 978,166   |   | Men's suits, slacks, ties, sweaters, shoes, shirts, hats, belts, socks; and ladies' blouses, skirts, suits and dresses.  |
| 1,508,314 |  | Men's suits, slacks, ties, sweaters, jackets, coats, shoes, shirts, hats.  |
| 1,622,635 |  | Men's, women's and children's clothing, namely pants, scarves, shirts, blouses, jackets, sweaters, skirts, shoes, sleepwear and socks.   |

33. All of the registrations set forth above are valid, subsisting, unrevoked and uncanceled. Additionally, many of these registrations are incontestable. Polo Ralph Lauren also owns common law rights in the above and other marks for use in connection with apparel, related accessories and retail stores, including on-line retail stores. Polo Ralph Lauren's registered and common law trademarks are collectively referred to as the "POLO RALPH LAUREN Marks."

34. Polo Ralph Lauren has, itself and through licensees, sold high-quality apparel, handbags, accessories, and other products (collectively, the “Polo Ralph Lauren Products”) using the POLO RALPH LAUREN Marks for more than 40 years.

35. Polo Ralph Lauren was founded in 1967 by the now iconic designer, Ralph Lauren, and has since become a leader in the design, marketing, and distribution of premium lifestyle products in apparel, home, accessories and fragrances.

36. The continuous and broad use of the POLO RALPH LAUREN Marks during this time has enabled Polo Ralph Lauren Products to achieve world-wide fame under the POLO RALPH LAUREN Marks in its various markets. The public, customers, and the fashion industry have come to recognize that Polo Ralph Lauren bearing the POLO RALPH LAUREN Marks originate with Polo Ralph Lauren exclusively.

37. Polo Ralph Lauren has invested tens of millions of dollars in promoting the sale of Polo Ralph Lauren Products in a wide variety of media, and is the official sponsor of Wimbledon, the US Open and the 2008 and 2010 Olympics.

38. Polo Ralph Lauren maintains quality control standards for all of the Polo Ralph Lauren Products. All genuine Polo Ralph Lauren Products are inspected and approved by or on behalf of Polo Ralph Lauren prior to distribution and sale. All genuine Polo Ralph Lauren Products are distributed through Polo Ralph Lauren’s worldwide network of authorized dealers.

39. Polo Ralph Lauren displays its POLO RALPH LAUREN Marks and Polo Ralph Lauren Products in its advertising and promotional materials. To date, Polo Ralph Lauren has spent hundreds of millions of dollars in advertising and promoting the POLO RALPH LAUREN Marks and Polo Ralph Lauren Products, and Polo Ralph Lauren, its predecessors-in-interest and its affiliated companies have enjoyed billions of dollars in sales.

40. The THE NORTH FACE Marks and POLO RALPH LAUREN Marks are collectively referred to as “Plaintiffs’ Marks.” The North Face Products and Polo Ralph Lauren Products are collectively referred to as “Plaintiffs’ Products.”

### **DEFENDANTS’ CONDUCT**

41. Plaintiffs The North Face and Polo Ralph Lauren are victims of a massive Internet counterfeiting ring of a size and scale they have not seen before. Defendants, operating since at least as early as 2008, have manufactured, imported, distributed, offered for sale and sold counterfeit goods, including apparel, backpacks, shoes and gloves bearing counterfeits of THE NORTH FACE Marks or POLO RALPH LAUREN Marks (the “Counterfeit Products”) and continue to do so.

42. Defendants, without any authorization or license from Plaintiffs, have knowingly and willfully used and continue to use Plaintiffs’ Marks in connection with the advertisement, offer for sale and sale of the Counterfeit Products, through, *inter alia*, the Internet. The Counterfeit Products are not genuine Polo Ralph Lauren Products or The North Face Products. Plaintiffs did not manufacture, inspect or package the Counterfeit Products and did not approve the Counterfeit Products for sale or distribution.

43. Defendants operate a large number of websites they have designed to resemble authorized retail Internet stores selling Plaintiffs’ authentic goods, including using domain names containing Plaintiffs’ trademarks; copying Plaintiffs’ copyrighted images and photographs of genuine products with detailed product descriptions; offering “24/7” live online service; and displaying normal indicia of security protection that would appear on legitimate websites. A list showing examples of these websites currently known to Plaintiffs is attached hereto as **Exhibit A**. Any of Defendants’ websites might appear to unknowing consumers to be legitimate web stores authorized to sell genuine Plaintiffs’ Products.

44. Defendants' use of the Plaintiffs' Marks on or in connection with the advertising, marketing, distribution, offering for sale and sale of the Counterfeit Products is likely to cause and has caused confusion, mistake and deception by and among consumers and is irrevocably harming Plaintiffs.

45. Defendants have registered and are using a large number of domain names containing Plaintiffs' Marks, including, without limitation, 4TheNorthFace.com, 91Polo.com, AddNorthFace.com, AuthenticPolo.com, CheerPolo.com, ClothesPolo.com, DesignerRalph.com, ILoveTheNorthFace.com, NicePoloStore.com, NorthFace.cc, NorthFaceComing.com, NorthFaceMountain.com, NorthFaceOutdoor.com, NorthFaceOutletsale.com, North-Face-Sale.com, NorthFaceSaleOutlet.com, NorthFaceSalesOutlet.com, NorthFaceSaleStore.com, NorthFacesOutlet.com, NorthFaceSupply.com, OfficePolo.com, OfficialNorthFace.com, OfficialPolos.org, OnlineNorthFace.com, OutdoorNorthFace.com, OutletNorthFace.com, Polo4All.com, Polo4Sale.com, PoloCart.com, PoloNSale.com, Polo-Ralph.com, PoloRalphWorld.com, PoloShirtCompany.com, Polo-Shirts.us, PoloShirtsSale.com, PoloShirtsShop.com, PolosHome.com, PoloStore.us, PoloTShirtsHan.com, RalphLaurenDesigner.com, SaleNorthFaces.com, SellPoloShirts.com, TheNorthFaceComing.com, TheNorthFaceMoving.com, TheNorthFaceSaleOnline.com, TheNorthFaceSaleShop.Co.uk, TheNorthFaceSaleShop.com, TheNorthFaceSalesOnline.com, TheNorthFaceSaleStore.com, TheNorthFaceShow.com, TheNorthFaceSupplier.com, TheNorthFaceTrade.com, TheNorthFaceUKStore.com, TNFShopping.com, ToNorthFace.com and likely many others not yet discovered by Plaintiffs (collectively, the "Infringing Domain Names").

46. The Infringing Domain Names registered by Defendants are identical and/or confusingly similar to one or more of the THE NORTH FACE Marks or POLO RALPH LAUREN Marks.

47. Defendants have registered and are using the Infringing Domain Names with the bad-faith intent to profit from these marks, namely fooling consumers into believing Defendants' Websites selling Counterfeit Products are actually selling authentic The North Face and Polo Ralph Lauren Products.

**COUNT ONE**

**FEDERAL TRADEMARK COUNTERFEITING AND INFRINGEMENT**  
**(15 U.S.C. § 1114)**

48. Plaintiffs repeat and reallege the allegations above as if fully set forth herein.

49. The THE NORTH FACE Marks and the POLO RALPH LAUREN Marks and the goodwill of the businesses associated with them in the United States and throughout the world are of great and incalculable value, are highly distinctive, and have become universally associated in the public mind with The North Face Products and Polo Ralph Lauren Products and related services of the very highest quality and reputation finding their source from each The North Face Products and Polo Ralph Lauren, respectively.

50. Without Plaintiffs' authorization or consent, and having knowledge of both Plaintiffs' well-known and prior rights in Plaintiffs' Marks and the fact that Defendants' Counterfeit Products bear marks which are intentionally confusingly similar to the Plaintiffs' Marks, Defendants have manufactured, distributed, offered for sale and/or sold the Counterfeit Products to the consuming public in direct competition with The North Face and Polo Ralph Lauren's sale of genuine The North Face Products and Polo Ralph Lauren Products, in or affecting interstate commerce.

51. Defendants' use of copies or simulations of the THE NORTH FACE Marks and the POLO RALPH LAUREN Marks in conjunction with Defendants' Websites and the Counterfeit Products is likely to cause and is causing confusion, mistake and deception among the general purchasing public as to the origin of the Counterfeit Products, and is likely to deceive the public into believing the Counterfeit Products being sold by Defendants originate from, are associated with or are otherwise authorized by The North Face and Polo Ralph Lauren, all to the damage and detriment of each Plaintiff's reputation, goodwill and sales.

52. Plaintiffs have no adequate remedy at law and, if Defendants' activities are not enjoined, each Plaintiff will continue to suffer irreparable harm and injury to its goodwill and reputation.

## **COUNT TWO**

### **UNFAIR COMPETITION AND FALSE DESIGNATION OF ORIGIN** **(15 U.S.C. § 1125(a))**

53. Plaintiffs repeat and reallege the allegations above as if fully set forth herein.

54. The Counterfeit Products sold and offered for sale by Defendants are of the same nature and type as each Plaintiff's Products sold and offered for sale by each Plaintiff and, as such, Defendants' use is likely to cause confusion to the general purchasing public.

55. By misappropriating and using the Plaintiffs' Marks and trade names, Defendants misrepresent and falsely describe to the general public the origin and source of the Counterfeit Products and create a likelihood of confusion by consumers as to the source of such merchandise.

56. Defendants' unlawful, unauthorized and unlicensed manufacture, distribution, offer for sale and/or sale of the Counterfeit Products creates express and implied



misrepresentations that the Counterfeit Products were created, authorized or approved by Plaintiffs, all to Defendants' profit and to Plaintiffs' great damage and injury.

57. Defendants' aforesaid acts are in violation of Section 43(a) of the Lanham Act, 15 U.S.C. § 1125(a), in that Defendants' use of the Plaintiff's Marks, in connection with their goods and services, in interstate commerce constitutes a false designation of origin and unfair competition.

58. Plaintiffs have no adequate remedy at law and, if the Defendants' activities are not enjoined, each Plaintiff will continue to suffer irreparable harm and injury to its goodwill and reputation.

### **COUNT THREE**

#### **CYBERSQUATTING UNDER THE ANTICYBERSQUATTING CONSUMER PROTECTION ACT** **(15 U.S.C. § 1125(d)(1))**

59. Plaintiffs repeat and reallege the allegations above as if fully set forth herein.

60. The Infringing Domain Names are identical or confusingly similar to one or more of the THE NORTH FACE Marks or the POLO RALPH LAUREN Marks, which were distinctive and/or famous at the time Defendants registered each of the Infringing Domain Names.

61. Defendants registered and have used the Infringing Domain Names with a bad-faith intent to profit from the Plaintiffs' Marks.

62. Defendants' activities as alleged herein violate the federal Anticybersquatting Consumer Protection Act, 15 U.S.C. § 1125(d)(1).

63. Plaintiffs have no adequate remedy at law and, if the Defendants' activities are not enjoined, Plaintiffs will continue to suffer irreparable harm and injury to its goodwill and reputation.

**COUNT FOUR**

**UNLAWFUL DECEPTIVE ACTS AND PRACTICES**  
**(New York General Business Law § 349)**

64. Plaintiffs repeat and reallege the allegations above as if fully set forth herein.

65. Defendants, without Plaintiffs' authorization or consent, and having knowledge of each Plaintiff's well-known and prior rights in each Plaintiff's Marks, and the fact that Defendants' Counterfeit Products bear marks which are identical to Plaintiffs' Marks, Defendants have manufactured, imported, distributed, offered for sale and/or sold the Counterfeit Products to the consuming public in direct competition with Plaintiffs' sale of genuine merchandise and in violation of New York General Business Law § 349.

66. Defendants' use of copies or simulations of Plaintiffs' Marks is likely to cause and is causing confusion, mistake and deception among the general purchasing public as to the origin of Defendants' Counterfeit Products, and is likely to deceive the public into believing the Counterfeit Products being sold by Defendants originate from, are associated with, or are otherwise authorized by Plaintiffs.

67. Defendants' deceptive acts and practices involve public sales activities of a recurring nature.

68. Plaintiffs have no adequate remedy at law and, if Defendants' activities are not enjoined, Plaintiffs will continue to suffer irreparable harm and injury to their goodwill and reputations.

**PRAYER FOR RELIEF**

WHEREFORE, Plaintiffs pray for judgment against Defendants as follows:

1. That Defendants, their officers, agents, servants, employees, attorneys, confederates, and all persons acting for, with, by, through or under them be permanently enjoined and restrained:

- a. from using Plaintiffs' Marks in any manner in connection with the advertising, offering for sale, or sale of any product not Plaintiffs', or not authorized by Plaintiffs to be sold in connection with each of Plaintiffs' Marks;
- b. from passing off, inducing, or enabling others to sell or pass off any product as and for products produced by Plaintiffs, which are not Plaintiffs' or not produced under the control and supervision of Plaintiffs and approved by Plaintiffs for sale under Plaintiffs' Marks;
- c. from committing any acts calculated to cause purchasers to believe that Defendants' products are those sold under the control and supervision of Plaintiffs, or sponsored or approved by, or connected with, or guaranteed by, or produced under the control and supervision of Plaintiffs;
- d. from further infringing all of Plaintiffs' Marks and damaging Plaintiffs' goodwill;
- e. from otherwise competing unfairly with Plaintiffs in any manner;
- f. from shipping, delivering, distributing, returning or otherwise disposing of, in any manner, products or inventory not manufactured by or for Plaintiffs, nor authorized by Plaintiffs to be sold or offered for sale, and which bear any Plaintiffs' Marks; or

g. using, linking to, transferring, selling, exercising control over, or otherwise owning the Infringing Domain Names or any other domain name that incorporates, in whole or in part, any of Plaintiffs' Marks.

6. That Defendants, within thirty (30) days after service of judgment with notice of entry thereof upon it, be required to file with the Court and serve upon Plaintiffs a written report under oath setting forth in detail the manner in which Defendants have complied with paragraphs 5, a through g, *supra*.

7. That the Infringing Domain Names be deleted from the root zone servers operated and maintained by the domain name registries VeriSign, Inc and Nuestar, Inc.

8. That VeriSign, Inc. and Nuestar, Inc. be required to cooperate with a registrar to be appointed by Plaintiffs to re-register the Infringing Domain Names in Plaintiffs' respective names and under Plaintiffs' respective ownership.

9. That Defendants account for and pay over to Plaintiffs profits realized by Defendants by reason of Defendants' unlawful acts herein alleged and, that the amount of damages for infringement of Plaintiffs' registered trademarks be increased by a sum not exceeding three times the amount thereof as provided by law.

10. In the alternative, that Plaintiffs be awarded statutory damages of \$2,000,000 for each and every Plaintiffs' Mark counterfeited by each Defendant and \$250,000 per Infringing Domain Name for Defendants' willful counterfeiting and cybersquatting of the Plaintiffs' Marks.

11. That Plaintiffs be awarded reasonable attorneys fees and have such other and further relief as the Court may deem equitable including, but not limited to, any relief set forth under Sections 34-39 of the 1946 Trademark Act and/or C.G.S.A. §§ 35-11(i), 42-110(a) *et seq.*, 42-110(b) *et seq.*

Dated: New York, NY  
March 1, 2010

Respectfully submitted,

By: \_\_\_\_\_

G. Roxanne Elings (elingsr@gtlaw.com)

Scott Gelin (gelins@gtlaw.com)

Seth E. Kertzer (kertzers@gtlaw.com)

MetLife Building

200 Park Avenue

New York, NY 10166

Telephone: (212) 801-9200

Facsimile: (212) 801-6400

*Attorneys for The North Face Apparel Corp.  
and PRL USA Holdings, Inc.*

# EXHIBIT A

| Domain             | Central Linking Factor | Registrar              | Address  | Country       | City         | Email  | SP   |
|--------------------|------------------------|------------------------|--|---------------|--------------|--|--|
| 08hot.com          | Model Search           | grs.hichina.com        | beijingfengtaiqingtaxiuyuan23d<br>ong10men103shi   | China         | beijing      | langyanel@yahoo.com.cn                         | VPLS INC. D/B/A KRYPT<br>TECHNOLOGIES<br>SINGLEHOP INC |
| 12hot.com          | Model Search           | whois.godaddy.com      | shenjinbo beijing, 100360 ,<br>925 Wheelwood Way 10044   | China         |              |  | ALTUSHOST INC  |
| 40trade.com        | Model Search           | whois.dns.com.cn       | Rosbrook Dr. 448313 WG<br>Andy Huang sie.skels,eksl als sla<br>361000 Phone: +1.323 34 Fax:<br>+2345643 Email              | United States |              |  | BLUEHOST INC   |
| 4thenorthface.com  | Product Search         | whois.name.com         | 12530 Crested Moss NE 611<br>Moore st 403502 WG  | United States |              |  | ALTUSHOST INC  |
| 50trade.com        | Model Search           | whois.dns.com.cn       | Protected Domain<br>125 Rampart Way Suite 300<br>Denver CO 80230 Phone:<br>+1.7202492374 Email<br>NCR-530561               | United States |              | 9thandbags.com@protecteddom<br>ainservices.com | THEPLANET.COM INTERNET<br>SERVICES INC                 |
| 91handbags.com     | Model Search           | whois.name.com         | hiLuoHuQuBuXinBuXinHuaYu<br>an1Qu9 City: Shen<br>Province/state: GD Country:<br>Postal Code: 518001<br>Hao chen<br>guo kun | United States |              |  | GODADDY.COM INC<br>WEBXN<br>SOFTLAYER TECHNOLOGIES INC |
| 91polo.com         | Shipping Text Match    | whois.todayinc.com     | Michael Lin Tiantang Road<br>Hangzhou Zhejiang 310000<br>Phone: +86.13666935173 Email<br>fretrean Road                     | China         |              | uu54478@gmail.com<br>barrettsean@gmail.com     | ALTUSHOST INC<br>AKANOC SOLUTIONS INC                  |
| axapshops.com      | Shipping Text Match    | whois.name.com         | 2405 thomas rd th st ne 831573<br>WG   | China         | chengdu      |  | ALTUSHOST INC  |
| ataxale.com        | Model Search           | whois.dns.com.cn       | 1233 hamlin street Po Box 8688<br>471634 WG  | United States |              |  | ALTUSHOST INC  |
| authenticpolo.com  | Model Search           | whois.dns.com.cn       | 2459 sw daisy rd 2117 S<br>Andover Rd 545887 WG  | United States |              |  | ALTUSHOST INC  |
| b2bflood.com       | Model Search           | whois.dns.com.cn       | Nanri town putian 351100 FJ  | China         |              |  | ALTUSHOST INC  |
| b2bsharing.com     | Shipping Text Match    | whois.dns.com.cn       | 103 the broadway highland<br>farm rd apt 603505 WG   | China         |              |  | ALTUSHOST INC  |
| b2bshine.com       | Shipping Text Match    | whois.dns.com.cn       |  | United States |              |  | ALTUSHOST INC  |
| b2cforyou.com      | Product Search         | whois.godaddy.com      | MeiYuan road Putian City Fujian<br>Putian, New York 35000  | United States |              |  | THEPLANET.COM INTERNET<br>SERVICES INC                 |
| bachmail.com       | Page Match             | Wild West Domains      | 1719 Brandywine CT Atlanta,<br>Georgia   | United States | Atlanta      | rmmsms@126.com                                 | PANAMASERVER.COM                                       |
| bootsdept.com      | Model Search           | whois.dns.com.cn       | isfwf Foreignness 876523 WG<br>130 guangda Foshang,<br>Guangdong 301100  | Faroe Islands |              |  | ALTUSHOST INC  |
| bybclolthes.com    | Shipping Text Match    | whois.godaddy.com      | shijiazhuang   | China         |              |  | GODADDY.COM INC  |
| bykshirt.com       | Model Search           | grs.hichina.com        | asdfsad Foreignness 234234<br>WG   | China         | shijiazhuang | greendeon@go2mart.com                          | ALTUSHOST INC  |
| cheapgoodssale.com | Model Search           | whois.dns.com.cn       | 931 7th avenue 125 springs rd,<br>792159 WG  | United States |              |  | ALTUSHOST INC  |
| cheerpolo.com      | Model Search           | whois.dns.com.cn       | 1360 N Hancock St. Anaheim,<br>CA 92807  | United States |              |  | ALTUSHOST INC  |
| clothespolo.com    | Model Search           | whois.tucows.com       | xiaohmie   | United States |              |  | LUNAR PAGES<br>LUNAR PAGES                             |
| crazypurchase.com  | Page Match             | whois.paycenter.com.cn | orgevete Road bbjbbfjb 126250<br>WG  | China         | guangzhou    |  | ALTUSHOST INC  |
| crazyshipping.com  | Shipping Text Match    | whois.dns.com.cn       | 6227 cielo grande dr 11 South<br>10th Street 794950 WG   | Ecuador       |              |  | ALTUSHOST INC  |
| designerralph.com  | Image Match            | whois.dns.com.cn       | 3301 Otis St. 1902 n salina<br>215002 WG   | United States |              |  | ALTUSHOST INC  |
| easybuying.com     | Shipping Text Match    | whois.dns.com.cn       | xuzhen fu  | United States |              |  | ALTUSHOST INC  |
| ebabiz.com         | Links to Network Site  | whois.paycenter.com.cn | feifei wang 15976606054 fax:<br>0159-26606054 wuhan wuhan  | China         | putian       |  | AKANOC SOLUTIONS INC<br>GODADDY.COM INC                |
| ebayholder.com     | Shared Server          | whois.bizcn.com        | hubei 361004cn   | China         |              | 865169938@qq.com                               | SOFTLAYER TECHNOLOGIES INC<br>THEPLANET.COM INTERNET   |
| ecdeals.com        | Model Search           | whois.enam.com         | Ramsey 2400 Queens Chapel Rd<br>Hyattsville 20782US  | United States |              |  | SERVICES INC   |
| edhardystores.net  | Shared Server          | whois.paycenter.com.cn | lingfeng   | China         | guangzhou    |  | GLOBAL NET ACCESS LLC                                  |
| exportmike.com     | Shared Server          | whois.bizcn.com        | zh 123456 fax: 123456 qz qz fj<br>320000cn   | China         |              | zh688@yahoo.com.cn                             | SOFTLAYER TECHNOLOGIES INC                             |



| Domain                | Central Linking Factor                    | Registrar  | Registrant  | Address  | Country       | City                | Email   | ISP  |
|-----------------------|---|--|---|--|---------------|---------------------|---|--|
| factory4replica.com   | Product Search                            |  | Andy Huang  | Andy Huang sie.skels,eks! als sia<br>361000 Phone: +1.323 34 Fax:<br>+2345643 Email  | United States |                     |   | BLUEHOST INC   |
| fashionholder.com     | Product Search                            | whois.name.com                                   | Andy Huang  | Andy Huang sie.skels,eks! als sia<br>361000 Phone: +1.323 34 Fax:<br>+2345643 Email  | United States |                     |   | OC3 NETWORKS & WEB<br>SOLUTIONS                                      |
| goodgoodshop.com      | Shipping Text Match                       | whois.dns.com.cn                                 | Jose  | 216 logan st apt3 60 State Hwy<br>94 427978 WG   | United States |                     |   | ALTUSHOST INC  |
| groupshoes.com        | Model Search                              | whois.name.com                                   | Michael   | Michael Lin Tiantang Road<br>Hangzhou Zhejiang 310000<br>Phone: +86.13666935173 Email                                      | China         |                     | uu54478@gmail.com                             | ALTUSHOST INC  |
| hushbuy.com           | Product Search                            | whois.name.com                                   | Michael   | Michael Lin Tiantang Road<br>Hangzhou Zhejiang 310000<br>Phone: +86.13666935173 Email                                      | China         |                     | uu54478@gmail.com                             | ALTUSHOST INC  |
| ilikeshop.com         | Model Search                              | whois.dns.com.cn                                 | Liu Dongping  | sbytephanie Road kbhebj<br>589157 WG   | Bolivia       |                     |   | ALTUSHOST INC  |
| ilovethenetwork.com   | New Domain - Not Built -<br>Same Behavior | whois.paycenter.com.cn                           | li wen  | baiyouxiamen<br>Fujianputian City: putian<br>Province/state: FJ Country:<br>Postal Code: 351100                            | China         | xiamen              |   | XIANGDAXIN NETWORKS<br>TECHNOLOGY CO. LTD                            |
| inthegeo.com          | Model Search                              | whois.todaynic.com                               | Yuan Chen   | 125 Rampart Way Suite 300<br>Denver CO 80230 Phone:<br>+1.3034596012 Email   | China         |                     |   | AKANDC SOLUTIONS INC   |
| ioffer.com            | Shared Server                             | whois.name.com                                   | Protected Domain<br>Services - Customer ID:<br>DSR-669253 | 351 Malabar Road<br>wulanchabu Registrant<br>neimengu Registrant Postal<br>012000 Registrant Registrant<br>Country CN      | United States |                     | hoffer.com@protecteddomainser<br>vices.com    | GLOBAL NET ACCESS LLC  |
| jacketmail.us         | Model Search                              | whois.nic.us                                     | jing yang   |  | China         |                     | rona610@gmail.com                             | SOFTLAYER TECHNOLOGIES INC<br>THEPLANET.COM INTERNET<br>SERVICES INC |
| jacketscart.com       | Model Search                              | whois.godaddy.com                                | Domains by Proxy, Inc                                     | Andy Huang sie.skels,eks! als sia<br>361000 Phone: +1.323 34 Fax:<br>+2345643 Email  | United States |                     |   | BLUEHOST INC   |
| keepwinterwarm.com    | Product Search                            |  | Andy Huang  | cloin 55555 san josh, Colorado<br>33000  | United States |                     | 724224237@qq.com                              | HOSTFORWEB INC   |
| kinggoal.com          | Model Search                              | whois.godaddy.com                                | jonnyjo   |  | United States |                     |   | GLOBAL NET ACCESS LLC  |
| lowestbest-export.com | Shared Server                             | whois.fastdomain.com                             | lowestbest-exp.co.ltd                                     | Qiaoying Wu block 523 ,Gongye<br>road Gulou Fuzhou, 350002<br>Tiantang Road  | China         |                     | ladies_space@hotmail.com<br>uu54478@gmail.com | ALTUSHOST INC  |
| mallabroad.com        | Model Search                              | whois.godaddy.com                                | Michael Lin   |  | China         | Zhejiang            |   | ALTUSHOST INC  |
| mallabroad.com        | Model Search                              | whois.name.com                                   | Michael   | Michael Lin Tiantang Road<br>Hangzhou Zhejiang 310000<br>Phone: +86.13666935173 Email<br>536MillardFarmerRd                | China         |                     | uu54478@gmail.com                             | ALTUSHOST INC  |
| martheaven.com        | Shipping Text Match                       | whois.dns.com.cn                                 | lynda   | 536MillardFarmerRd 433518<br>WG  | United States |                     |   | ALTUSHOST INC  |
| mensclothingus.com    | Model Search                              | whois.paycenter.com.cn                           | wang liming   | wangliming<br>8887 36th st 22810 tiny trail<br>601064 WG   | China         | guangzhou           |   | ALTUSHOST INC<br>LUNAR PAGES   |
| mixitems.com          | Shipping Text Match                       | whois.dns.com.cn                                 | anthony   | Xueyuan Road<br>710057Weyuan Road, Registrant  | United States |                     | hzpikq@163.com                                | AKANOC SOLUTIONS INC<br>WEBNX  |
| moncler-jackets.org   | Contact Detail Match                      | Public Interest Registry                         | huang zhipeng   | Putian Registrant Fujian<br>Registrant Postal 361004<br>Registrant Registrant Country<br>CN                                | China         | Putian              |   | WEBNX  |
| moncler-jackets.us    | Contact Detail Match                      | whois.nic.us                                     | Minglei Lu  | #36 weiping road Registrant<br>putian Registrant fujian<br>Registrant Postal 361007<br>Registrant Registrant Country<br>CN | China         | Putian              | monclerjacketsus@yahoo.com                    | WEBNX  |
| moncleronaleus.com    | Contact Detail Match                      | whois.nic.us                                     | Mingteong Lu  |  | China         |                     | 54981835@qq.com                               | WEBNX  |
| mybrandclothing.com   | Links to Network Site<br>Model Search     | whois.paycenter.com.cn<br>whois.paycenter.com.cn | tangyifei<br>wang liming                                  | home<br>Fujianputianshimeiyuanluaxin   | China         | putian<br>guangzhou | tang007@foxmail.com                           | AKANOC SOLUTIONS INC<br>LUNAR PAGES                                  |

| Domain                  | General Linking Facts | Registrar                | Address  | Country              | City                | Email   | Host                     |
|-------------------------|-----------------------|--------------------------|--|----------------------|---------------------|---|--------------------------|
| mybeans.com             | Shared Server         | whois.paycenter.com.cn   | zhiguo zhao  | China                | Beijing             |   | GLOBAL NET ACCESS LLC    |
| myshopbay.com           | Shipping Text Match   | whois.godaddy.com        | maixinas Road hefei, anhui<br>7138290                              | China                |                     |   | ALTUSHOST INC            |
| ntnfinonline.com        | Shared Server         | whois.dns.com.cn         | Jonathan   | United States        |                     |   | ALTUSHOST INC            |
| nicepofstore.com        | Model Search          | whois.dns.com.cn         | Stewart  | United States        |                     |   | ALTUSHOST INC            |
| niceskechers.com        | Model Search          | whois.dns.com.cn         | Cristina   | United States        |                     |   | ALTUSHOST INC            |
| nikedubs.com            | Product Search        | whois.bizcn.com          | songjiang  | China                |                     | zi_zi_12@126.com                              | PANAMASERVER.COM         |
| northface.cc            | Model Search          | whois.webnic.cc          | Dongming Li  | China                | Fujian              | lanlingwork@qq.com                            | COGSWELL ENTERPRISES INC |
| northfacecoming.com     | Model Search          | whois.dns.com.cn         | sharon   | United States        |                     |   | ALTUSHOST INC            |
| northfacemountain.com   | Model Search          | whois.dns.com.cn         | Kayce  | Panama               |                     |   | ALTUSHOST INC            |
| northfaceoutdoor.com    | Model Search          | whois.dns.com.cn         | marcus   | United States        |                     |   | ALTUSHOST INC            |
| northfaceoutletsale.com | Model Search          | whois.dns.com.cn         | sdfgsdfr Foreignness 23452 WG                                      | United States        |                     |   | ALTUSHOST INC            |
| northface-sale.com      | Model Search          | whois.godaddy.com        | chengxiang district, xialin Road<br>Putian, Fujian 351100          | China                |                     |   | GODADDY.COM INC          |
| northfacesaleoutlet.com | Model Search          | whois.dns.com.cn         | Yuehua Trading<br>company  | China                |                     |   | ALTUSHOST INC            |
| northfacesaleoutlet.com | Registrant Match      | whois.above.com          | tina   | China                |                     | honimshi@gmail.com                            | STAMINUS COMMUNICATIONS  |
| northfacesalestore.com  | Model Search          | whois.dns.com.cn         | Ho Nim   | China                | Pudong              |   | AKANOC SOLUTIONS INC     |
| northfacesoutlet.com    | Model Search          | whois.paycenter.com.cn   | kjhdfh   | Equatorial<br>Guinea |                     | kssgoodbuy@gmail.com                          | ALTUSHOST INC            |
| northfacesupply.com     | Model Search          | whois.dns.com.cn         | Jillier Cunningham<br>23834 draceae ave 20089                      | China                | South Russel        |   | ALTUSHOST INC            |
| officepolo.com          | Model Search          | whois.dns.com.cn         | lan  | United States        |                     |   | ALTUSHOST INC            |
| officialnorthface.com   | Model Search          | whois.dns.com.cn         | Elizabeth  | United States        |                     |   | ALTUSHOST INC            |
| officialpolos.org       | General Text Match    | Public Interest Registry | Any  | United States        | 1407 15th<br>street | celticf1888@live.ie                           | ALTUSHOST INC            |
| onlinenorthface.com     | Model Search          | whois.dns.com.cn         | andrew   | United States        |                     |   | ALTUSHOST INC            |
| onlinepointstore.com    | Model Search          | whois.dns.com.cn         | PERIKUS  | United States        |                     |   | ALTUSHOST INC            |
| outdoornorthface.com    | Model Search          | whois.dns.com.cn         | michelle   | United States        |                     |   | BASESQUARED              |
| outletnorthface.com     | Model Search          | whois.dns.com.cn         | Trelene  | United States        |                     |   | ALTUSHOST INC            |
| polo4all.com            | Shipping Text Match   | whois.dns.com.cn         | Leanne   | United States        |                     |   | ALTUSHOST INC            |
| polo4sale.com           | Image Match           | whois.dns.com.cn         | rebecca  | United States        |                     |   | ALTUSHOST INC            |
| polocart.com            | Model Search          | whois.godaddy.com        | Shafiq   | United States        |                     |   | SINGLEHOP INC            |
| polonsale.com           | General Text Match    | whois.dns.com.cn         | Domains by Proxy, Inc  | United States        |                     |   | ALTUSHOST INC            |
| polo-raiph.com          | Shared Server         | whois.name.com           | Massimo<br>Protected Domain<br>Services Customer ID:<br>DSR1037121 | United States        |                     | polaralph.com@protecteddomain<br>services.com | GLOBAL NET ACCESS LLC    |
| poloshirtworld.com      | Model Search          | whois.dns.com.cn         | clare  | United States        |                     |   | ALTUSHOST INC            |
| poloshirtcompany.com    | Image Match           | whois.dns.com.cn         | Paul   | United States        |                     |   | ALTUSHOST INC            |
| polo-shirts.us          | Model Search          | whois.nic.us             | lunmin lia   | China                |                     | lunmin_lia@hotmail.com                        | LUNAR PAGES              |

| Domain                      | Central Linking Factor | Registrar              | Registrant               | Address   | Country       | City      | Email                   | ISP                                 |
|-----------------------------|------------------------|------------------------|--------------------------|---|---------------|-----------|-------------------------|-------------------------------------|
| poloshirtssale.com          | Model Search           | whois.fastdomain.com   | Attn: poloshirtssale.com | BlueHost.com- INC 1958 South 950 East ** FREE DOMAIN REGISTRATION ** Hosting plans starting at ONLY \$6.95 per month - Provo, Utah 84606 Admin 3655 Torrance Blvd Torrance CA 90503US | United States |           | whois@bluehost.com      | BLUEHOST INC                        |
| poloshirtssale.com          | Model Search           | whois.enom.com         | DNS                      | 125 springs rd. P.O. Box 990 125463 WG  | United States |           |                         | GIGENET                             |
| poloshome.com               | Shipping Text Match    | whois.dns.com.cn       | Jose                     | 509huajiang road 2628,Room 9-203 Registrant Shanghai Registrant Postal 200437 Registrant Registrant Country CN  | United States |           |                         | ALTUSHOST INC                       |
| polostore.us                | Shipping Text Match    | whois.nic.us           | Fel Xu                   | 4284 Worth St 2524 High Ridge Dr. 414669 WG   | China         |           | okmyhosting@hotmail.com | GLOBAL NET ACCESS LLC               |
| poloshirtshan.com           | Model Search           | whois.dns.com.cn       | sarah                    | damianjie, 391100 China   | United States |           |                         | ALTUSHOST INC                       |
| product-wholesale.com       | Model Search           | whois.godaddy.com      | xing dataoulong          | Box Ct 3262 silverwood drive 965436 WG  | China         |           |                         | LA HABRA - LUNAR PAGES              |
| ralphlaurendesigner.com     | Image Match            | whois.dns.com.cn       | Audrey                   | 18715 Echo Pines 1208 george ct apt 2 819413 WG   | United States |           |                         | ALTUSHOST INC                       |
| retailias.com               | Model Search           | whois.dns.com.cn       | christina                | 1628 Maple St 1245 Biscayne rd. 542953 WG   | United States |           |                         | ALTUSHOST INC                       |
| salenorthfaces.com          | Model Search           | whois.dns.com.cn       | Alison                   | 219 w 5th ave 3436 fletcher dr. #1 391354 WG  | United States |           |                         | ALTUSHOST INC                       |
| searchbikini.com            | Model Search           | whois.dns.com.cn       | Donna Allsop             | wangliming  | United States | guangzhou |                         | ALTUSHOST INC                       |
| selfpoloshirts.com          | Model Search           | whois.paycenter.com.cn | wang liming              | 819 butterfly ln 4792 pl s.e. 772845 WG   | China         |           |                         | LUNAR PAGES                         |
| sharing-gate.com            | Model Search           | whois.dns.com.cn       | Sarah                    |   | United States |           |                         | ALTUSHOST INC                       |
| shoessaler.com              | Shared Server          | whois.cn.hooyao.com    | Hao chen                 | Sable Pointe Drive Eagle Bluff Drive 974900 WG  | N/A           | Tianjin   |                         | GLOBAL NET ACCESS LLC               |
| shoppinginthebox.com        | General Text Match     | whois.paycenter.com.cn | Gabbar                   | 2207 vandull drive 618 Pelham rd s 746333 WG  | China         |           |                         | WEBNX                               |
| takefashionaway.com         | Model Search           | whois.dns.com.cn       | chris                    |   | United States |           |                         | ALTUSHOST INC                       |
| tblpop.com                  | Shipping Text Match    | whois.dns.com.cn       |                          |   | United States |           |                         | ALTUSHOST INC                       |
| tgool.com                   | Model Search           | whois.name.com         | Michael                  | Michael Lin Tiantang Road Hangzhou Zhejiang 310000 Phone: +86.13666935173 Email   | China         |           | uu54478@gmail.com       | ALTUSHOST INC                       |
| theb2bonline.com            | Model Search           | whois.dns.com.cn       | Vikki                    | 2355 west 10755 south 2137 Maynard Dr. 544402 WG 1187728-501 Nam Natou road   | United States |           |                         | ALTUSHOST INC                       |
| thenorthfacecoming.com      | Model Search           | whois.above.com        | Ho Nim                   | Shanghai 200125 Tel. +86.13671866757 Fax: xiansheng cai 13859851061 fax: 0592-2296505 putian putian   | China         | Fangzi    | honimsiho@gmail.com     | STAMINUS COMMUNICATIONS             |
| thenorthfacemoving.com      | Contact Detail Match   | whois.cn.hooyao.com    | caixiansheng             | fulian 361100cn   | China         |           | 148073336@qq.com        | N/A                                 |
| thenorthfacesaleonline.com  | Model Search           | whois.dns.com.cn       | wwwewret                 | dgdgdthd Foreignness 243553 WG  | United States |           |                         | ALTUSHOST INC                       |
| thenorthfacesaleshop.co.uk  | Model Search           | whois.nic.uk           | zhongjiaxiaoshou         | guangdongshengxingnishiwei kouzhen shenzhen guangdong 518 000   | China         |           |                         | THEPLANET.COM INTERNET SERVICES INC |
| thenorthfacesaleshop.com    | Page Match             | whois.dns.com.cn       | fdgdgdg                  | sisdaigd Foreignness 354645 WG  | United States |           |                         | ALTUSHOST INC                       |
| thenorthfacesalesonline.com | Model Search           | whois.dns.com.cn       | Max                      | 444 n. 18 th ave. 2412 53rd Street 737534 WG  | United States |           |                         | ALTUSHOST INC                       |
| thenorthfacesalestore.com   | Model Search           | whois.dns.com.cn       | dgdgdth                  | dfdfgthd Foreignness 343535 WG  | United States |           |                         | ALTUSHOST INC                       |
| thenorthfaceshow.com        | Model Search           | whois.dns.com.cn       | kenneth                  | 3113 fredricksburg drive 4717 Shadeway Rd 314819 WG   | United States |           |                         | ALTUSHOST INC                       |
| thenorthfacesupplier.com    | Model Search           | whois.cn.hooyao.com    | caixiansheng             | xiansheng cai 13859851061 fax: 0592-2296505 putian putian fulian 361100cn   | China         |           | 148073336@qq.com        | ALTUSHOST INC                       |
| thenorthfacetrade.com       | Model Search           | whois.cn.hooyao.com    | caixiansheng             | xiansheng cai 13859851061 fax: 0592-2296505 putian putian fulian 361100cn   | China         |           | 148073336@qq.com        | ALTUSHOST INC                       |



| Domain                  | Central Linking Factor | Registrar                | Registrant                                    | Address  | Country       | City      | Email                 | ISP                        |
|-------------------------|------------------------|--------------------------|---|--|---------------|-----------|-----------------------|----------------------------|
| thenorthfaceukstore.com | Model Search           | whois.dns.com.cn         | kate  | 1002 Lakehurst Rd apt 208<br>Fredricksburg drive 309905 WG                           | United States |           |                       | ALTUSHOST INC              |
| timberlandsky.com       | Model Search           | whois.name.com           | Michael                                       | Michael Lin Tiantang Road<br>Hangzhou Zhejian 310000<br>Phone: +86.13666935173 Email | China         |           | uu54478@gmail.com     | ALTUSHOST INC              |
| tnfshopping.com         | Model Search           | whois.dns.com.cn         | Sergei  | Gregory Avenue Harry d. st. #10<br>450958 WG   | United States |           |                       | ALTUSHOST INC              |
| tonorthface.com         | Model Search           | whois.dns.com.cn         | Abdur   | huaerstreet florida 932857 WG<br>Leo john 05953322266 fax:                           | United States |           |                       | ALTUSHOST INC              |
| tradeglorry.com         | Shared Server          | whois.bizcn.com          | Huang ming                                    | 05953322266 88 hualin Road<br>fuzhou fujian China putian city                        | China         |           | admin@tradeglorry.com | SOFTLAYER TECHNOLOGIES INC |
| uggcardy.org            | Model Search           | Public Interest Registry | BlueHost.Com - INC                            | HOST UNLIMITED DOMAINS<br>*FREE*   | United States | Provo     | whois@bluehost.com    | BLUEHOST INC               |
| usuksale.com            | Model Search           | whois.dns.com.cn         | Wiedur  | 112 conifer rd 5813 Arnold St.<br>#647 164774 WG                                     | United States |           |                       | BASESQUARED                |
| vinshine.com            | Model Search           | whois.name.com           | Michael                                       | Michael Lin Tiantang Road<br>Hangzhou Zhejian 310000<br>Phone: +86.13666935173 Email | China         |           | uu54478@gmail.com     | ALTUSHOST INC              |
| vogueport.com           | Shared Server          | whois.paycenter.com.cn   | Guangzhou open<br>sesame technology<br>co.ltd | may<br>zhongnan road 12 beijing,<br>beijing 100038                                   | China         | guangzhou |                       | SOFTLAYER TECHNOLOGIES INC |
| wearmyrolexnow.com      | Model Search           | whois.godaddy.com        | lin yinding                                   |  | China         |           |                       | GODADDY.COM INC            |
| wholesale-retailer.com  | Model Search           | whois.dns.com.cn         | Debra   | 4 robin lane berkley 501570 WG   | United States |           |                       | ALTUSHOST INC              |
| wholesale-retailer.com  | Model Search           | whois.dns.com.cn         | Debra   | 4 robin lane berkley 501570 WG   | United States |           |                       | ALTUSHOST INC              |
| worldwholesaler.net     | Model Search           | whois.dns.com.cn         | David   | hooper drive buchanan blvd apt<br>459938 WG  | United States |           |                       | ALTUSHOST INC              |
| wowboats.com            | Model Search           | whois.dns.com.cn         | antti-jussi                                   | 318 Darby Terrace 2405 thomas<br>rd 782699 WG  | United States |           |                       | BASESQUARED                |